

ALEX G. TSE (CABN 152348)  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR 15-0582-WHO
	)	
Plaintiff,	)	UNITED STATES' WITNESS LIST
	)	
v.	)	Pretrial Conference: Aug. 13, 2018
	)	Time: 2:00 P.M.
ADAM SHAFI,	)	Court: Hon. William H. Orrick
	)	Courtroom: No. 2, 17 <sup>th</sup> Floor
Defendant.	)	
	)	

The United States hereby provides this notice of witnesses it expects to call in its case-in-chief and a general summary of their testimony. The United States is working with the defense to potentially streamline this list through stipulations where appropriate. The government may add or not call witnesses based on the Court's rulings at the pretrial conference and as necessary based on the pre-trial and trial proceedings.

Number	Witness	Subject of Testimony
1.	CBP Officer Kok Gordon Mon	The witness will testify regarding Adam Shafi's statements upon his return to the U.S. in August 2014.
2.	DSS Johnny Ceballos-Rivera	The witness was the Assistant Regional Security Officer at the U.S. Embassy in Egypt in August 2014 and he will testify regarding an interview there with S.S.
3.	CBP Officer Johnny Castillo	The witness will testify regarding his interview of A.N. upon his return to the U.S. in August 2014.
4.	CBP Officer Celia Lopez	The witness will testify about Adam Shafi's, A.N.'s, and S.K.'s international travel records in 2014.
5.	Custodian of records, Wells Fargo	The witness will testify regarding S.K.'s general banking records, including purchases for Adam Shafi's Royal Jordanian ticket in 2014; E-visas in 2014; and S.K.'s United Airlines ticket for travel in 2014.
6.	Custodian of records, Royal Jordanian	The witness will testify that Adam Shafi traveled on a one-way ticket from Egypt to Turkey in August 2014.
7.	Custodian of records, CheapoAir	The witness will testify to S.K.'s purchases in July 2014.
8.	Custodian of records, Student Universe	The witness will testify regarding A.N.'s and S.K.'s ticket purchases in 2014.
9.	Custodian of records, United Airlines	The witness will testify that S.K. did not use his ticket to Turkey for travel in August 2014.
10.	Custodian of records, British Airways	The witness will testify regarding A.N.'s travel in August 2014.
11.	Custodian of Records, FareCompare	The witness will testify as to Adam Shafi's search in 2015 for travel to Turkey.
12.	Custodian of Records, Turkish Airlines	The witness will testify that Adam Shafi purchased a one-way ticket to Turkey for travel on 06/30/15.
13.	Mark Mauro	The witness is a former Special Agent with HSI. He

		participated in interviews of Adam Shafi at SFO after his attempted flight to Turkey on 6/30/15. He will testify regarding Adam Shafi's statements and belongings at SFO.
<b>14.</b>	FBI SA Glen Bartolomei	SA Bartolomei participated in and witnessed Mauro's interview of Adam Shafi at SFO on 6/30/15.
<b>15.</b>	Jamlah Nasser	The witness worked the ticket counter at Turkish Airlines at SFO on 6/30/15. She assisted Adam Shafi at check-in and saw him later at the gate.
<b>16.</b>	Thomas Edel	The witness is a former Special Agent with NASA who worked as a Task Force Officer with the FBI and he transported Adam Shafi after his arrest on 7/3/15. He will testify regarding Adam Shafi's statements that day.
<b>17.</b>	FBI SA Zachary Karem	SA Karem worked with Thomas Edel in transporting Adam Shafi after his arrest on 7/3/15.
<b>18.</b>	FBI SA Matthew Sung	SA Sung will testify about Adam Shafi's actions after he left SFO on 6/30/15. SA Sung was also the finder and custodian of evidence regarding the searches at the Shafi residence.
<b>19.</b>	FBI SA Jeremiah Wilson	SA Wilson was the photographer for the searches at the Shafi residence on 7/3/15. SA Wilson will testify as to the pictures memorializing the searches.
<b>20.</b>	FBI SA Thomas Wei	SA Wei was the sketcher and photo logger for the searches at the Shafi residence on 7/3/15. SA Wei will testify about the searches on that date, including the layout of the Shafi residence.
<b>21.</b>	Rajkumar Thirumalainambi	The witness is an FBI computer scientist and forensic examiner who was noticed as an expert witness in a letter dated March 12, 2018. He processed and/or imaged electronic media and data including, but not limited to, an Apple MacBook Pro, a Samsung cell

		phone, and a hard drive and Blue Ray disc each containing imaged data retrieved from miscellaneous storage devices and an HP laptop seized at the Shafi residence. He was involved in multiple aspects of the digital review in this case.
<b>22.</b>	FBI SA Jeffrey Miller	SA Miller is DExT (Digital Extraction Technician) certified. He imaged items seized from the search at the Shafi residence, including Adam Shafi's Samsung Galaxy S4 and other digital media.
<b>23.</b>	Beth Mauldin	The witness is a Forensic Examiner at the RCFL. She imaged and/or processed electronic devices seized from A.N., including an iPhone and MacBook Pro.
<b>24.</b>	FBI SA Amanda Chung	SA Chung is a Forensic Examiner at the RCFL. SA Chung processed electronic evidence seized from A.N.'s devices, including a MacBook Pro.
<b>25.</b>	Ronald Posadas	The witness is a Detective with Newark Police Department, working as a Task Force Officer with the FBI, and is a Forensic Examiner at the RCFL. He imaged and processed electronic evidence seized from S.K., including S.K.'s cell phone and tablet.
<b>26.</b>	FBI SA Michael Mansuy	SA Mansuy is DExT certified. He imaged an HP laptop seized during the search at the Shafi residence.
<b>27.</b>	Tiffany Pettit	Ms. Pettit is the general manager of Target Masters, a shooting range in Milpitas. She will testify regarding the business and Adam Shafi's visit there on 04/01/15.
<b>28.</b>	FBI SSA Jamal King	SSA King will testify regarding the telephone intercepts. SSA King will testify regarding the process by which call intercepts are conducted and he will authenticate the calls.
<b>29.</b>	Linda Butros	Ms. Butros is a linguist with the FBI. She was noticed as an expert witness. She will testify to the translations

		in the case, including the telephone intercepts, Google and YouTube searches, and items found during the search. The government will also offer a glossary of relevant terms in Arabic into evidence through this witness.
<b>30.</b>	Custodian of records, Santa Clara Sheriff's Office	The witness will testify regarding visitor log and audio recording relating to Adam Shafi's visit with A.H. on 03/15/15.
<b>31.</b>	Custodian of records, Google and YouTube	The witness will testify regarding Adam Shafi's email account, and Google and YouTube searches and viewing histories.
<b>32.</b>	Custodian of records, AT&T	The witness will testify regarding A.N.'s phone and text records.
<b>33.</b>	Custodian of records, T-Mobile	The witness will testify regarding phone and text messages for Adam Shafi and S.K.
<b>34.</b>	Custodian of records, American Express	The witness will testify regarding Adam Shafi's general credit card history, including the following specific purchases on his card: round-trip ticket to Egypt in 2014; several purchases at Apple; and a travel expense in Turkey in August 2014.
<b>35.</b>	Custodian of records, Bank of America	The witness will testify regarding Adam's Shafi's checking account, including several payments made to Islamic Relief; and a \$2400 cash withdrawal on 06/30/15.
<b>36.</b>	Custodian of records, Yahoo!	The witness will testify regarding A.N.'s email records.
<b>37.</b>	Custodian of records, Alameda County Sheriff's Department	The witness will testify regarding visitor records relating to Adam Shafi, including recordings.
<b>38.</b>	FBI SA Chris Reinke	SA Reinke will provide summary testimony about the investigation and evidence in the case, including a

		<p>1 timeline of events: the 2014 trip to Turkey; the</p> <p>2 telephone intercepts; Google and YouTube searches and</p> <p>3 viewing history; travel and financial records; telephone,</p> <p>4 text and email messages; evidence recovered on</p> <p>5 electronic devices; and items seized during the search of</p> <p>6 the Shafi residence.</p>
39.	Lorenzo Vidino	<p>7 Mr. Vidino was noticed as a terrorism expert. His</p> <p>8 testimony is summarized in the government's expert</p> <p>9 witness disclosure dated March 12, 2018, and</p> <p>supplemented in Dkts. 210; 216.</p>

10 Dated: August 6, 2018

11 Respectfully submitted,

12 ALEX G. TSE  
13 United States Attorney

14 /s/ Elise LaPunzina  
15 S. WAQAR HASIB  
16 ELISE LAPUNZINA